

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TONOPAH SOLAR ENERGY, LLC,¹

Debtor.

Chapter 11

Case No. 20-11884 (KBO)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR TELEPHONIC HEARING ON SEPTEMBER 4, 2020 AT 10:00 A.M. (ET)**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING
MUST APPEAR THROUGH COURTCALL, LLC.**

**PARTIES SHOULD CONTACT COURTCALL, LLC
AT 844-925-0626 TO REGISTER THEIR APPEARANCE.**

RESOLVED MATTERS

1. Debtor's Motion for Entry of an Order Authorizing the Debtor to Enter into Operation and Management Agreement [[D.I. 46](#), 7/30/20]

Response/Objection Deadline: August 13, 2020 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Pleadings:

- A. Notice of Amended Exhibit [[D.I. 79](#), 8/18/20]
- B. Certificate of No Objection [[D.I. 134](#), 8/31/20]
- C. Order Authorizing the Debtor to Enter into Operation and Maintenance Agreement [[D.I. 137](#), 9/1/20]

Status: An order has been entered.

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is Tonopah Solar Energy, LLC (1316). The Debtor's headquarters is located at 11 Gabbs Pole Line Road, Tonopah, NV 89049.

2. Debtor's Motion for Entry of an Order Authorizing Rejection of Operation and Maintenance Agreement Effective as of the Date of Transfer of Operations and Maintenance Services [[D.I. 47](#), 7/30/20]

Response/Objection Deadline: August 13, 2020 at 4:00 p.m. (ET)
[Extended until August 28, 2020 for PIC Group, Inc.]

Responses/Objections Received:

- A. Informal comments from PIC Group, Inc.

Related Pleadings:

- B. Certification of Counsel [[D.I. 135](#), 8/31/20]
C. Order Authorizing Rejection of Operation and Maintenance Agreement Effective as of the Date of Transfer of Operations and Maintenance Services [[D.I. 138](#), 9/1/20]

Status: An order has been entered.

CONTESTED MATTER GOING FORWARD

3. Debtor's Motion for an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of Ballot and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief [[D.I. 36](#), 7/30/20]

Response/Objection Deadline: August 13, 2020 at 4:00 p.m. (ET)
[Extended for Brahma Group, Inc.]

Responses/Objections Received:

- A. Informal comments from the Office of the United States Trustee
B. Informal comments from Brahma Group, Inc.
C. Objection of SolarReserve CSP Holdings, LLC to Debtors' Request for Approval of Disclosure Statement [[D.I. 133](#), 8/28/20]

Related Pleadings:

- D. Chapter 11 Plan for Tonopah Solar Energy, LLC [[D.I. 25](#), 7/30/20]
- E. Disclosure Statement for Chapter 11 Plan for Tonopah Solar Energy, LLC [[D.I. 26](#), 7/30/20]
- F. Notice of Filing of Plan Supplement for the Chapter 11 Plan for Tonopah Solar Energy, LLC [[D.I. 49](#), 7/30/20]
- G. Notice of Hearing to Consider Approval of Disclosure Statement [[D.I. 58](#), 7/31/20]
- H. Notice of Filing Revised Proposed Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of Ballot and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief [[D.I. 139](#), 9/2/20]
- I. Debtor's Reply to SolarReserve CSP Holdings, LLC and CMB Infrastructure Investment Group IX, LP's Objection to Approval of Disclosure Statement [[D.I. 140](#), 9/2/20]
- J. Debtors' Motion for an Order Granting Debtor Leave and Permission to File a Reply in Support of the Disclosure Statement [[D.I. 141](#), 9/2/20]
- K. Notice of Filing of Blacklined Versions of (I) Chapter 11 Plan for Tonopah Solar Energy, LLC, and (II) Disclosure Statement for Chapter 11 Plan for Tonopah Solar Energy, LLC [[D.I. 142](#), 9/2/20]

Status: Items A and B have been resolved. This matter is going forward.

[Signature page follows]

Dated: September 2, 2020
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

Edmon L. Morton (No. 3856)
Matthew B. Lunn (No. 4119)
Allison S. Mielke (No. 5934)
Jared W. Kochenash (No. 6557)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253
Email: emorton@ycst.com
mlunn@ycst.com
amielke@ycst.com
jkochenash@ycst.com

-and-

WILLKIE FARR & GALLAGHER LLP

Matthew A. Feldman (admitted *pro hac vice*)
Paul V. Shalhoub (admitted *pro hac vice*)
Andrew S. Mordkoff (admitted *pro hac vice*)
Ciara A. Copell (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019-6099
Tel: (212) 728-8000
Fax: (212) 728-8111
Email: mfeldman@willkie.com
pshalhoub@willkie.com
amordkoff@willkie.com
ccopeall@willkie.com

Co-Counsel to the Debtor and Debtor in Possession